

**Application No: 09/497,773**

### **REMARKS/ARGUMENTS**

With respect to the Office Communication of September 9, 2003, Applicants have amended independent claims 16, 19, and 23 in accordance with the directions provided by Examiner Cuff to overcome the Restriction presented in the Final Office Action of March 24, 2003. Applicants appreciate the time and efforts of Examiner Cuff expended in conjunction with the interviews of October 6, 2003 and October 7, 2003.

With respect to paragraphs 1-5 of the Office Action mailed March 24, 2003, claims 1-15 have been cancelled and claims 16, 19 and 23 are amended as suggested by the Examiner.

Applicants agree with the Examiner that the Wolff reference does not specify that a second word in the domain name is product related and repeat previous arguments in relation to Wolff and Boyle.

There is no motivation, teaching, or suggestion to combine the unique numerical identifier of Wolff with the descriptive update service names shown in Boyle. Further, the combination of the two references would be technically undesirable due to the increased database searching complexity of using a descriptive word index instead of the unique numerical index. Thus, the combination of the Wolff reference with the Boyle reference is not appropriate.

Applying *Graham v. John Deere* 383 U.S. 1, 148 USPQ 459 (1966), the scope and content of Wolff describes a unique database record identifier that is embedded within an advertising banner. Boyle discloses a system to keep mobile device subscribers informed of updated to desired information through the use of a list of page identifying URLs having a traditional directory structure. In ascertaining the differences, neither Wolff nor Boyle together or in combination shows the combination of a common name portion and a product name portion in a domain name, among other aspects of claims 16-41. One of ordinary skill in the pertinent art at the time of invention would not have combined these two reference to produce the claimed invention because the combination does not produce the claimed invention.

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Furthermore, Applicants submit the attached Declaration under 37 C.F.R. §1.132 that shows objective evidence of Non-obviousness. The linguistic combination of words used in the formation of website URLs produced unexpected results and commercial success, in addition to satisfying a long felt need in the marketplace.

As described in the Declaration, the banner advertising of Wolff is ineffective as a result of declining click through rates. On the other hand, an embodiment of the claimed invention produced significant commercial success. Because Wolff is directed to banner advertising, a combination of Wolff and Boyle would not produce the effect described in the articles submitted with the Declaration.

Applicants have previously presented claims 16-41 and have amended independent claims 16, 19, and 23. Applicants submit that each of the previously presented claims is in condition for allowance.

None of the cited references teaches the specific combination as recited in claim 16. For example, none of the cited references teaches a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first product name portion, where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teaches or suggests establishing a second website having a second website domain name, where the second website domain name includes the common name portion and a second product name portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teaches that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 16, Wolff teaches a single host site 102 that offers products within a product database.

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Further, none of the cited references teach creating a website direct link between the first website (having a first product name and offering a first product) and the second website (having a second identifying product name and offering a second product). The Wolff reference describes providing links between the sponsor site and the host server 12, but not between different product offering sites where each product offering site has a product identifying portion with the respective website domain name. For at least the foregoing reasons, claim 16 is in condition for allowance.

None of the cited references teaches the specific combination as recited in claim 19. For example, none of the cited references teaches a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first product name portion, where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teaches or suggests establishing a second website having a second website domain name, where the second website domain name includes the common name portion and a second product name portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teaches that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 19, Wolff teaches a single host site 102 that provides information regarding products by searching a product database.

Further, none of the cited references discloses establishing a third website having a third website domain name, the third website domain name including the common name portion and a third product name portion, where the third product name portion describes a third product of the plurality of interrelated products offered for sale via the third website. Further, the cited references fail to disclose that third product is related to the first product and is related to the

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second product, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 19 is allowable over the cited references.

None of the cited references teaches the specific combination as recited in claim 23. For example, none of the cited references teaches a method of offering a plurality of interrelated services through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first service name portion, where the first service name portion identifies a first service of the plurality of interrelated services identified via the first website.

Further, none of the cited references teaches or suggests establishing a second website having a second website domain name, where the second website domain name includes the common name portion and a second service name portion, and where the second service name portion identifies a second service of the plurality of interrelated services identified via the second website. In addition, none of the cited references teaches that the second service offered via the second site is related to the first service offered via the first site. In contrast to claim 23, Wolff teaches a single host server 12 that provides information regarding products by searching a product database.

Further, none of the cited references discloses establishing a third website having a third website domain name, the third website domain name including the common name portion and a third service name portion, where the third service name portion describes a third service of the plurality of interrelated services identified via the third website. Further, the cited references fail to disclose that the third service is related to the first service and is related to the second service, and that the third website is separately accessible via the electronic communications network.

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Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 23 is also allowable over the cited references.

Claims 17-18, 20-22, and 24-41 depend from one of the claims above that, for at least the foregoing reasons, the Applicants submit are novel and non-obvious and, thus, allowable.

For at least the foregoing reasons, each of the pending claims 16-41 are submitted to be in condition for allowance, a Request for Continued Examination has been submitted with the associated fee, and allowance of the pending claims is respectfully requested.

In conclusion, Applicants have overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

10 - 8 - 2003  
Date

**OFFICIAL**

  
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